



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

Ms. Sandra Lyon, Superintendent  
Santa Monica Malibu Unified School District  
1651 Sixteenth Street  
Santa Monica, California 90404  
slyon@smmusd.org

Dear Superintendent Lyon:

Thank you for submitting your polychlorinated biphenyls (PCBs) cleanup Application. The Application consists of the "Site-Specific PCB-Related Building Materials Management, Characterization and Remediation Plan for the Library and Building E Rooms 1, 5, and 8 at Malibu High School" dated July 2014 as subsequently amended by the email message from Jan Maez to Tom Huetteman on August 14, 2014 and the "Supplemental Removal Information for the Library, Building E – Rooms 1, 5, and 8 and Building G – Room 506 at Malibu High School" dated September 26, 2014. The Application addresses removal of PCB-containing caulk, remediation of the substrate in contact with this caulk, verification sampling, and continued implementation of best management practices (BMPs) to ensure that PCB levels remain safe.

The Toxic Substances Control Act (TSCA) regulations prohibit the use of caulk containing PCBs at or above 50 ppm (PCB-containing caulk). When found, PCB-containing caulk must be removed and disposed of in accordance with TSCA regulations. Under the Application, the District will (1) remove PCB-containing caulk currently known and verified at Malibu High School within 10 months (or no later than June 30, 2015) and (2) remove any newly discovered PCB-containing caulk within one year after the District verifies that the caulk contains PCBs at or above 50 ppm. This EPA approval does not cover the removal or disposal of the PCB-contaminated caulk itself because the TSCA PCB regulations do not require EPA approval of caulk disposal so long as the disposal is in accordance with 40 CFR 761.62(a) or (b).

EPA's approval does apply to the remediation measures pertaining to the substrate underneath the PCB-contaminated caulk, known as PCB remediation waste in the TSCA regulations. Pursuant to 40 CFR 761.61(c)<sup>1</sup>, EPA is approving the following procedures from the Application to address PCB remediation waste at Malibu High School (MHS) and Juan Cabrillo Elementary School (JCES):

- Porous substrates (e.g., concrete) will receive the following treatment after PCB-containing caulk is removed: Surface preparation and application of a double coat of a non-VOC epoxy-based sealant followed by application of new caulk. After consultation with EPA, surface wipe verification testing will be performed.
- Non-porous substrates (e.g., metal) will be decontaminated with a solvent to achieve a surface wipe concentration of less than 1ug/100cm<sup>2</sup> based on verification wipe tests.
- BMPs will be implemented regularly with weekly, monthly and annual procedures.

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<sup>1</sup> Risk-based disposal approval application for PCB remediation waste.

- After consultation with EPA, periodic air and surface wipe samples will be collected to monitor the overall effectiveness of the remediation measures.
- Removal or decontamination of porous substrates to 1 ppm will occur at the time of major renovation or demolition.

An approval under 40 CFR 761.61(c) requires EPA to make a finding that PCB remediation wastes remaining in place at MHS and JCES will not pose an unreasonable risk of injury to health or the environment. EPA finds that the District meets this standard for MHS and JCES based on the BMPs implemented and air and surface wipe samples data from the two schools as discussed below.

Following EPA guidance, the District developed and implemented a plan of BMP that included more frequent and improved procedures for cleaning their schools, identification and removal of PCB-containing florescent light ballasts, and inspection and repair of deteriorating caulk. These procedures were implemented during the summer and continue as documented in the Application and this approval.

To evaluate exposures to PCBs and the effectiveness of BMPs, 163 air and 503 surface wipe samples were conducted during the summer. These testing results were compared to health-protective screening levels. All but two pre-BMP and none of the post-BMP air samples were below applicable EPA public health levels for air. Of the 503 surface wipe samples, 482 were below the health-based screening level of 1 ug/100 cm<sup>2</sup> and 84% were non-detect. After BMPs, only two locations exceeded the screening level. In one location, the wipe sample was associated with a sample directly on caulk. That caulk will be removed and none of the other 8 wipe sample locations in that room were above the screening level. The other room with one location above the screening level post-BMP was only slightly above that level (at 2.6 ug/100cm<sup>2</sup>) while nine other post-BMP surface wipe locations from throughout the same room were non-detect. This data demonstrates that the PCB exposure pathways of greatest concern, namely air and dust, are being addressed in a manner that makes the schools safe.

Finally, this approval does not relieve the District and its consultants from complying with other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Departure from this approval without prior written permission from EPA may result in revocation of this approval. If additional information demonstrates that EPA can no longer make a no unreasonable risk determination, EPA will modify or revoke the approval.

We appreciate the District's efforts in addressing PCBs at schools within the District. Please call Steve Armann at 415.972.3352 if you have questions regarding this TSCA PCB approval.

Sincerely,

Jeff Scott, Director  
Land Division

cc: Stewart Black, DTSC